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10 Attorneys for Plaintiff,
11 *Andrea Cecere*

12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 * * *

15 **Andrea Cecere**, an individual,,

16 Plaintiff,

17 vs.

18 **LVGV, LLC**, a foreign corporation dba M
19 Resort Spa and Resort and Vig Deli; **The**
20 **Burks Companies, Inc.**, a foreign
21 corporation; Doe Individuals 1-1-; Roe
Business Entities 11-20

22 Defendant.

Case No.: 2:23-cv-02049-JAD-MDC

**Stipulation and Order to Continue
Hearing on ECF [49] LVGV, LLC.'s
Motion to Dismiss and to Extend
Dispositive Motion Deadline**

23 COMES NOW, Plaintiff Andrea Cecere and Defendants, LVGV, LLC., and The Burks
24 Companies, Inc., by and through their respective counsel of record, stipulate and
25 agree as follows:
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I. Discovery Completed To Date

- a. Deposition of Plaintiff;
- b. Deposition of fact witnesses;
- c. Exchange of written discovery;
- d. Disclosure of experts;
- e. Deposition of 30(b)(6) representatives for both defendants;
- f. Deposition of experts.

II. Discovery Left To Be Completed

- a. None

III. Reasons For Extension

a. Hearing on LVGV's Motion to Dismiss Amended Complaint

Defendant LVGV has a pending motion to dismiss punitive damages on the pleadings that was set for March 5, 2025. The Court moved this hearing to March 20, 2025, for the Court's convenience, not because of a conflict not related to the parties' schedule (ECF No. 59). The parties are needing to reschedule this hearing because unfortunately Plaintiff's counsel has no attorneys available to appear on March 20, 2025.

b. Dispositive Motion Deadline

The parties were set for the dispositive motion deadline on March 14, 2025.

The parties request continuing the dispositive motion deadline to April 14 because what happens at the hearing on LVGV's Motion to Dismiss has a direct effect on the parties' dispositive motion strategies. The parties have excusable neglect to make this request because the Court's moving of the hearing was not at the parties' request.

IV. Proposed Schedule

The parties propose continuing the dispositive motion deadline from March 15, 2025 to April 14, 2025. The pre-trial order would be due May 9, 2025. If a



dispositive motion is filed, it will be due 30 days from the entry of the order on that dispositive motion. Therefore,

IT IS HEREBY STIPULATED AND AGREED, that the hearing on ECF [49] LVGV, LLC.'s Motion to Dismiss currently set for March 20, 2025, at 11:30 a.m. be continued to March 24, 2025, at a time convenient for the Court or to the Court's next available date.

IT IS FURTHER STIPULATED AND AGREED, that the dispositive motion deadline be extended to April 14th, 2025.

DATED this 10th day of March, 2025

DATED this 10th day of March, 2025

H&P LAW

WILSON ELSEY

/s/ Marjorie Hauf

/s/ Jonathan Pattillo

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DATED this 10th day of March, 2025

HALL & EVANS, LLC

/s/ Adam Knecht

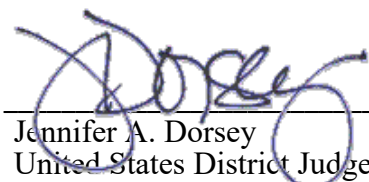
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Attorneys for The Burks Companies,
Inc.

IT IS THEREFORE ORDERED the hearing on ECF [49] LVGV, LLC.'s Motion to Dismiss be continued to March 24, 2025, at 11:30 a.m.

IT IS FURTHER ORDERED the deadline to file dispositive motions is extended to April 14, 2025.

IT IS SO ORDERED.

Dated: 3/17/2025


Jennifer A. Dorsey
United States District Judge